

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

<b>In re Terrorist Attacks on September 11, 2001</b>	<b>03 MDL 1570 (GBD)(SN) ECF Case</b>
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**This document also relates to member case:**

***Marie Laure Anaya, et al. v. Islamic Republic of Iran, 1:18-cv-12341 (GBD) (SN)***

**NOTICE OF MOTION FOR ENTRY OF PARTIAL FINAL JUDGMENT  
FOR NON-IMMEDIATE FAMILY MEMBERS OF THE LATE MICHAEL W. LOWE**

***(ANAYA/IRAN IV)***

**PLEASE TAKE NOTICE** that, by and through their undersigned counsel and upon the accompanying Memorandum of Law, the Declaration of P. Joseph Donahue executed on October 24, 2022, together with the Exhibits annexed thereto, the Court's Order of October 21, 2022 (ECF 129 in 18-cv-12341 and ECF 8665 in 03-MDL-1570), and all prior pleadings and proceedings had herein, *Anaya/Iran* Plaintiffs Donovan Lanham, Gary Lanham, and Jasmine Jackman respectfully move this Court for an Order awarding:

- (1) solatium damages to Donovan Lanham, Gary Lanham, and Jasmine Jackman for the losses they suffered as stepchildren of the late Michael W. Lowe in the same amount previously awarded to similarly-situated stepchildren of other decedents killed in the terrorist attacks on September 11, 2001; and
- (2) prejudgment interest on such damages at the rate of 4.96 percent per annum, compounded annually for the period from September 11, 2001 until the date of the judgment; and
- (3) permission for Donovan Lanham, Gary Lanham, and Jasmine Jackman to seek punitive damages or other damages at a later date; and
- (4) permission for all other *Anaya/Iran* Plaintiffs to submit applications for damages awards in later stages, to the extent such awards have not previously been addressed; and

(5) such other and further relief as this Honorable Court deems just and proper.

This motion is made in connection with the judgment on default as to liability entered against the Islamic Republic of Iran on October 5, 2021 (ECF 70 in 18-cv-12341 and ECF 7178 in 03-MDL-1570).

Dated: October 24, 2022  
White Plains, New York

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